

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
(Alexandria Division)

FIRST FLIGHT LIMITED PARTNERSHIP  
4080 Lafayette Center Suite 360  
Chantilly VA 20151

Plaintiff

v.

ALLIANCE TECHNOLOGY GROUP, LLC  
3900 Westerre Pkwy  
Suite 300  
Richmond VA 23233  
Serve:  
National Registered Agents Inc.  
4701 Cox Road, Suite 285  
Glen Allen VA 23060

Defendant

Civil No. 1:18cv11

**COMPLAINT**

Comes now First Flight Limited Partnership, by and through Joel S. Aronson and for a cause of action states as follows:

1. Plaintiff First Flight Limited Partnership (“First Flight”) is a Virginia limited partnership with its principal place of business in Chantilly Virginia.
2. First Flight’s general partner is a Virginia corporation with its principal place of business in Chantilly Virginia. First Flight’s limited partner is a natural person domiciled in Fairfax County, Virginia.
3. Defendant Alliance Technology Group, LLC (“ATG”) is a Maryland limited liability company with its principal place of business in Hanover, Maryland. Its members are natural persons domiciled in Maryland.
4. There is complete diversity of citizenship between the parties and the amount in controversy exceeds \$75,000.

5. Personal Jurisdiction and Venue are proper in this District and Division as ATG maintains an office in this District and transacts business in this division.

**COUNT I**  
**Breach of Lease**

6. On or about October 3, 2013 the parties entered into lease of real property located within the Topflight Air Park, Hagerstown Maryland. First Flight, as landlord, leased the subject premises to ATG as tenant. A true and accurate copy of the lease is attached hereto as Exhibit A.
7. The lease term was from October 15, 2013 to October 15, 2016 at a monthly rent of \$100,000.
8. ATG failed to pay rent from December 15, 2013 to the end of the lease term.
9. The total owed by ATG to First Flight, with interest through November 15, 2017 is \$4,658,850 plus attorney's fees. Interest continues to accrue at the rate of \$35,700 per month.

WHEREFORE, First Flight Limited Partnership demand judgment against Alliance Technology Group, LLC in the full and just amount of \$4,658,000 plus interest from November 15, 2017, costs and attorney's fees.

First Flight Limited Partnership

By:       /s/ Joel S. Aronson        
Joel S. Aronson

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